



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

AUG 31 1988

Ref: 8HWM-RI

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REF ID	
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(A) *[Signature]* *[Signature]*
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RE: Hillside 881 Area
Remedial Investigation
and Feasibility Study
Comments

Gentlemen:

EPA has reviewed the March 1, 1988, Remedial Investigation/Feasibility Study (RI/FS) for the 881 Hillside area. EPA has consulted with the Colorado Department of Health (CDH) regarding the review and EPA is now forwarding comments on the RI/FS. CDH review comments are forthcoming. EPA and CDH share DOE's and Rockwell International's desires for a timely remedy at these contaminated areas.

The review has taken longer than expected due to EPA's and CDH's concerns for a thorough review. This is the first of many significant site evaluations which will be conducted at Rocky Flats. The review is intended to clearly identify expectations for future site evaluations and clean-up efforts at Rocky Flats. Comments regarding the RI/FS are enclosed.

Our review revealed deficiencies in the implementation of the site evaluation and the data interpretation stages of the RI. This has led to concern with regard to several conclusions presented in the RI/FS. EPA and CDH cannot conclude that the data reported in the RI support the conclusions in the RI/FS. Also of concern is the omission of important pathways of migration evaluations and a general lack of information on and documentation of ecological impacts, such as biota uptake.

ADMIN RECORD

"REVIEWED FOR CLASSIFICATION"

By *[Signature]*
Date 6/11/90

A-DU01-000020

effects on resident or migratory endangered species, and habitat degradation.

Although there may not be considerable concern regarding these matters related to the 881 Hillside area contamination, the RI/FS does not adequately justify or document that there is no ecological impact to the area affected by the 881 Hillside.

Areas where DOE's and Rockwell International's efforts can be commended, are in the risk assessment procedures and Applicable or Relevant and Appropriate Requirements (ARARs) portions of the FS. Although the data interpretation which the risk assessment is based on is questionable, the procedural aspects of the DOE and Rockwell derived risk factors were good and the results were conservative in nature. In the ARARs portion of the FS, a commendable mechanical process was followed, while the applicability or relevant and appropriate determinations need clarification. It should be noted that the enclosed comments include only EPA's ARARs evaluation. As a federal facility, under the Superfund Amendment and Reauthorization Act (SARA), DOE is the agency responsible for soliciting ARARs evaluation from CDH.

As you know, EPA and CDH commented on the draft 881 RI in August and October of 1987, respectively. The agencies note that there has been significant progress in the site evaluation since the initial reviews. EPA and CDH realize that the Compliance Agreement timeframes required submittal deadlines which were challenging and that DOE and Rockwell International have met the deadlines. In considering the quality of the submittal and the remaining deficiencies outlined in the enclosure, some of the concerns raised in the original 881 comments remain unresolved.

One major influence regarding an adequate remedy/corrective action decision is the determination of site background conditions. During a July 29, 1988 meeting with your staff, EPA and CDH were encouraged by plans set forth for a background sampling study to be conducted prior to winter of this year.

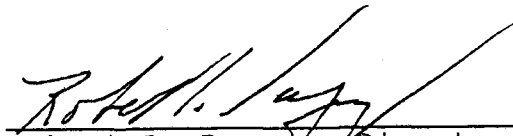
It is hopeful that enough progress has been made in the 881 RI so that a variety of options for moving forward to selection of a remedy could be investigated. Such progress greatly depends upon DOE's and Rockwell International's response to the enclosed comments and ability to move forward with background studies. It is important that future activities and schedules reflect the need for work plan review and approval, remedial option design review and approval, public input, etc. These future activities should be planned, in a realistic manner, and be based on experience gained from past activities which have led to this critical stage of remedial/corrective action selection. In light of the deficiencies of the present RI/FS, we would like to meet with your staff as soon as possible to discuss these comments,

the future direction of the investigation and the timeframe required to modify the document for resubmittal.

We look forward to working with you and your staff in order to resolve problems in the 881 RI/FS reports and reach agreement on options for site remediation/corrective action.

If you should have any questions regarding the enclosed comments and/or are prepared to meet to discuss the comments and future workplans or modifications, please contact Nathaniel J. Miullo at (303) 293-1668, Martin Hestmark at (303) 293-1506 or Mike Sattler at (303) 331-4844.

Sincerely yours,



Robert L. Duprey, Director
Hazardous Waste Management Division



David C. Shelton, Director
Hazardous Waste and Waste
Management Division

Enclosure